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CORRESPONDENCE

LYNCHBURG, VA., May 12, 1896.

Editor of Virginia Law Register :

Looking over the Acts of Assembly of the last session (which, by the way, are just published, so as to become known to the profession), among other curious matters I find the following:

In *Strouther v. Com'th*, decided at Staunton in September last, it was held that the accused, who had stolen a horse in West Virginia, and, being followed, was caught redhanded in Winchester, Va., could not be punished by our courts, for want of a statute authorizing punishment in such a case. (1 Va. Law Reg. 597.)

Presumably to supply the needful authority to punish in such a case the Act February 29, 1896, chap. 538, p. 576, was passed. It provides in the body of the Act that "if any person commit *larceny or robbery* beyond the jurisdiction of this State and bring the stolen property into the same, he shall be liable to prosecution and punishment for his offence in any county or corporation in which he may be found, as if the same had been wholly committed therein."

Curiously enough, the title to this Act, as to this portion of it, is that it makes "liable to punishment persons committing *robbery* beyond the State and bringing the stolen property within the same:" *omitting any mention of larceny*—the kind of offence actually committed in Strouther's case.

It may be a question of some nicety how far the specific mention in the title of one form of stealing will bring the omission therefrom of another form of stealing under the operation of the first clause of Art. V, sec. 15 of the Constitution, forbidding that a "law shall embrace more than one object, which shall be expressed in its title." Can a thief who is not a robber—such a thief, for example, as Strouther was—be punished in Virginia under this Act, any more than he could before it was enacted?

R. G. H. KEAN.

[See *Lacey v. Palmer*, Ante, p. 82.—EDITOR.]